

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Order Instituting Rulemaking to Establish the
California Institute for Climate Solutions.

Rulemaking 07-09-008
(Filed September 20, 2007)

**COMMENTS OF PACIFICORP (U 901-E) ON ESTABLISHING THE CALIFORNIA
INSTITUTE FOR CLIMATE SOLUTIONS**

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Pursuant to *Order Instituting Rulemaking to Consider Establishing California Institute for Climate Solutions* dated September 25, 2007 (the “OIR”), PacifiCorp (U 901-E) respectfully submits these comments on the establishment of the California Institute for Climate Solutions (“CICS”) proposal. PacifiCorp is an interested party and appreciates the opportunity to comment in this proceeding.

I. INTRODUCTION

PacifiCorp is a multi-jurisdictional utility that provides retail electric service to approximately 1.7 million customers in six states, including California, Idaho, Oregon, Utah, Washington and Wyoming. In California, PacifiCorp services approximately 46,500 customers in Del Norte, Modoc, Shasta and Siskiyou counties.

PacifiCorp has been actively involved in the implementation of Assembly Bill 32 and supports an open and comprehensive dialogue with Commission staff and other interested parties to address the challenges with implementing the legislation in a manner that is cost-effective for PacifiCorp’s customers, while achieving emission reduction goals.

The Commission has presented a series of questions to be considered by interested parties. In lieu of addressing each question individually, PacifiCorp provides herein general comments regarding the proposed CICS program for the Commission's consideration. Importantly, PacifiCorp respectfully requests that the Commission not perceive the absence of comments by PacifiCorp on any specific issue or other matter as a conclusive indication of PacifiCorp's lack of interest with respect thereto. PacifiCorp acknowledges the ongoing nature of this proceeding and reserves the right to present additional comments at a future time, as necessary.

II. DISCUSSION

A. Principles of the CICS Program

The OIR suggests three key ways that the proposed CICS could support California's GHG reduction goals: (1) mission-oriented, applied research that results in practical technological solutions and policy recommendations; (2) training of the next generation of researchers and professionals; and (3) dissemination of knowledge to practicing public and private sector professionals. While these three goals are, indeed, issues that need to be addressed as the nation, and the world, transition to a low-carbon economy, some fundamental questions should be asked regarding the establishment of the CICS: Who should pay for these efforts? What are the deliverables or the return on this investment? Are there other ways to address these needs?

1. The OIR recognizes the potentially broad impact of spending \$600 million to support achievement of California's GHG reduction goals in its statement that, "[O]ur policies have impacts beyond our borders and effect change regionally,

nationally, and globally.” Therefore, the \$600 million proposed to be spent can undoubtedly be seen as imposing a significant cost on electricity consumers in California for the greater good of not only helping California meet its goals, but also helping the region, nation and world in reducing GHG emissions. Is imposing this global cost on California energy consumers fair and just? Given its customer base in California, PacifiCorp submits that imposing this cost on its electricity customers is not fair and just, as further discussed herein.

2. PacifiCorp is hopeful that the Commission sees the development of the CICS as an investment, rather than an expense. When businesses decide to make an investment, it is with the understanding that there will be some type of return on the investment. Businesses expect to achieve milestones, receive deliverables, and, even if some research and development efforts are unsuccessful, they expect to have learned something from making the investment. PacifiCorp would expect the same principles to apply here. While the proposal submitted by the University of California is only a preliminary one, and the Commission anticipates further development of program and research priorities, development of the program details will be a critical part of whether PacifiCorp can support the establishment of the CICS. Furthermore, if, ultimately, the establishment of and costs associated with the CICS becomes a ratepayer-funded mandate, PacifiCorp believes it is appropriate to establish specific parameters relating to the types of efforts that are funded by ratepayer dollars.

3. PacifiCorp agrees with the concerns expressed by Commissioner Bohn that we need to be concerned about what is not discussed in the proposal, including whether there are more cost-effective ways to pursue development of a program such as that contemplated. There are numerous research institutions, both within other universities across the United States and elsewhere, as well as private institutions that are engaged in significant research and development efforts to reduce GHG emissions. For example, the Electric Power Research Institute has several programs that focus on energy-related solutions.¹ If California focuses either only on California solutions or California-developed solutions, these external efforts cannot be appropriately leveraged for the best solutions.

B. Funding

The CICS funding proposal includes an estimated budget of \$600 million over ten years, or \$60 million annually. The OIR requests comments on whether the annual cost of funding the CICS should be paid “equally by all ratepayers on an equal cents per kilowatt-hour basis and an equal cents per therm basis through utility bills.”² The OIR also considers whether a portion of CICS funding should be borne by shareholders.

PacifiCorp generally expresses concern with the OIR to the extent the OIR intends for PacifiCorp’s ratepayers and/or shareholders to bear the burden of funding the CICS.

PacifiCorp’s California customer base is limited and includes a significant proportion of low-

¹ See, the various 2008 research target areas, http://my.epri.com/portal/server.pt?space=CommunityPage&cached=true&parentname=CommunityPage&parentid=0&in_hi_userid=39735&control=SetCommunity&CommunityID=308&PageID=0

income customers. Further, PacifiCorp’s service territory lacks relatively large industrial customers. Collectively, these factors mean that PacifiCorp’s residential customers will likely bear a disproportionate burden for funding the CICS budget, as compared to other California investor-owned utility service territories. Based on initial estimates, PacifiCorp’s California customers could face a significant rate increase, perhaps by as much as \$300,000 annually assuming the proposed CICS funding levels. For residential customers, this may result in a 1% increase.

Subject to the comments raised herein, if the CICS is launched at ratepayer expense, the annual cost of funding the CICS should be paid equally by all electricity and natural gas ratepayers, but on a comparable “energy” basis. To the extent the annual costs are apportioned using a common energy metric, such as a British Thermal Unit (BTU)³ or calories, a greater share of the costs of the program will be borne by those who consume a greater amount of energy – electricity and natural gas – when compared to their peers. PacifiCorp respectfully requests that the Commission closely consider the localized impacts of CICS funding on California customers to ensure that no customer group is unfairly burdened by the program compared to similar customer groups elsewhere in the state.

PacifiCorp is also concerned regarding the opinion that shareholders may bear any direct burden associated with CICS funding. PacifiCorp’s statutory obligation to serve California customers has not traditionally extended to mandatory shareholder financing of public university institutions and climate-related research projects. PacifiCorp does not believe it should do so now. Imposition of such a cost on shareholders would serve to shift investments in investor-owned utilities outside the state of California, and thus would have the potential to negatively

² OIR at 6.

impact the financial viability of these companies.

Shareholders of investor-owned utilities, including PacifiCorp, may choose to fund other efforts for the common good of society. For example, PacifiCorp maintains a foundation to support shareholder funded community efforts, but its investments are not directed by state utility commissions. In fact, the PacifiCorp Foundation⁴ is one of the largest utility-endowed foundations in the United States. Since 1998, the Foundation has awarded more than 6,840 grants totaling approximately \$43.4 million. It has also established a permanent endowment, recently valued at more than \$46.5 million. Last year, the Foundation awarded more than 300 grants totaling more than \$2 million.

Finally, the benefits that may be derived from the CICS program will be difficult to justify to customers given the indirect nature of the benefits. PacifiCorp respectfully requests that the Commission closely examine the effect of such a policy on its customers given its specific service territory's demographics, as well as explain how a mandatory shareholder-funded program can be construed as part of a utility's obligation to its customers to provide cost-effective, reliable electric service.

C. Distribution of Resources

PacifiCorp's service territory is home to two community colleges: the College of the Redwoods located in Crescent City, California, and College of the Siskiyous located in Weed, California. There is no four-year state university institution located in PacifiCorp's service territory.

PacifiCorp is concerned that its California customers will not share in the potential

³ 10,000 BTU is roughly 2.93 kilowatt-hours of electricity or 9.7 cubic feet of natural gas.

benefits of the CICS program, while bearing the financial burden, since the UC system does not currently have a strong presence in the region. In addition to generally reducing GHG emissions throughout the state, the CICS program will likely result in research dollars, jobs and other economic development in communities and regions throughout the state. Unfortunately, for extreme Northern California, the reality is that the lack of large research facilities will present a challenge for ensuring that important, tangible benefits, such as job creation, are realized by PacifiCorp's customers.

PacifiCorp respectfully requests that the Commission give important consideration to substantially integrating the Community College system into the CICS program to ensure that program resources are equally distributed, including within PacifiCorp's service territory. Engagement of other institutions of higher learning will also result in a suitable framework to efficiently and effectively encourage broad participation in these programs.

III. CONCLUSION

PacifiCorp generally expresses concern with the OIR to the extent the OIR intends for PacifiCorp's ratepayers and/or shareholders to bear the burden of funding the CICS. If the CICS is launched at ratepayer expense, the annual cost of funding the CICS should be paid equally by all electricity and natural gas ratepayers, but on a comparable "energy" basis. PacifiCorp respectfully submits these comments for the Commission's consideration in establishing the CICS program. PacifiCorp looks forward to working with the Commission and other interested parties.

⁴ See, <http://www.pacificorpfoundation.org/>

Respectfully submitted this November 2, 2007 at San Francisco, California.

By /s/
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CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this 2nd day of November, 2007 provided via electronic mail, a true and correct copy of PacifiCorp's **COMMENTS OF PACIFICORP (U 901-E) ON ESTABLISHING THE CALIFORNIA INSTITUTE FOR CLIMATE SOLUTIONS** to the following:

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